

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

ASI, INC.,

Plaintiff,

v.

AQUAWOOD, LLC; BANZAI  
INTERNATIONAL LTD.; CHAN  
MING YIU a/k/a Samson Chan; CHAN  
SIU LUN a/k/a Alan Chan; DOLLAR  
EMPIRE LLC; BRIAN DUBINSKY;  
JUN TAI CO LTD.; LIU YI MAN a/k/a  
LISA LIU; PETER MAGALHAES;  
MANLEY TOY DIRECT, LLC a/k/a  
Worldwide Toy Direct; MGS  
INTERNATIONAL, LLC; PARK  
LANE SOLUTIONS, LTD; RICHARD  
TOTH; TOY NETWORK, LLC; TOY  
QUEST LTD.; WELLMAX TRADING  
LTD.; WINNING INDUSTRIAL LTD.,  
and MICHAEL WU,

Defendants.

CASE NO.: 0:19-cv-00763 (JRT/HB)

**CHAN MING YIU a/k/a SAMSON  
CHAN, CHAN SIU LUN a/k/a ALAN  
CHAN, LIU YI MAN a/k/a LISA LIU,  
TOY QUEST LTD., PARK LANE  
SOLUTIONS LTD., AND BANZAI  
INTERNATIONAL LTD.'S MOTION  
TO DISMISS**

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Defendants Chan Ming Yiu a/k/a Samson Chan, Chan Siu Lun a/k/a Alan Chan,  
Liu Yi Man a/k/a Lisa Liu, Toy Quest Ltd., Park Lane Solutions Ltd., and Banzai  
International Ltd.'s (collectively "Movants"), move this Court for an order dismissing the  
Movants from this case for lack of personal jurisdiction and failure to state a claim upon  
which relief may be granted. This Motion is based on the Memorandum of Law filed in  
accordance with Local Rule 7.1 and the arguments of counsel, together with all of the  
files, records, and proceedings to date.

Dated this 10th day of September, 2019.

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Lane Solutions Limited, and Toy Quest Limited